

**Cannock Chase Council:
Cannock Chase Local Plan
Representation Form**



Name of the Local Plan to which this representation relates: Cannock Chase Local Plan

Please return to: planningpolicy@cannockchasedc.gov.uk or:
Planning Policy, Cannock Chase Council, Civic Centre, PO Box 28,
Beecroft road, Cannock, Staffordshire, WS11 1BG

Please return by: 5:00pm on Monday 18 March 2024 (late forms will not be accepted)

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title	Mr	Mr
First Name	Alastair	Paul
Last Name	Bird	Hill
Post Town		
Organisation (where relevant)	St Modwen Homes	RPS
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
E-mail Address		

Do you consent to be notified about progress of the Cannock Chase Local Plan?

Yes No

Notifications: If you consent to be notified about progress on the Local Plan your details will be added to the consultation database. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Contact will be limited to information regarding planning policy and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

For Office Use	Part A Reference	
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Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Paul Hill, RPS
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Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

Q2. To which part of the document does this representation relate?

Para-graph:	4.5, 4.11, 4.15, 6.81-6.87	Policy:	Duty to Cooperate	Site:		Policies Map:	
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Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
 - B. Sound Yes: No:
 - C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).*

For office use	Part B reference	
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Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Duty to Cooperate and wider needs in the housing market area

Paragraphs 6.81-6.87 of the Plan provides a commentary on Neighbouring Authorities Housing Needs across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which includes Cannock Chase district. Paragraph 6.87 states:

“CCDC have developed the plan based on joint evidence, cooperative working and known shortfalls under the existing national planning framework (up to November 2023), and have committed to contribute to the unmet need of the HMA under the Duty to Cooperate. This is set out in the Councils Duty to Cooperate Statement of Compliance.” (RPS emphasis)

To this end, draft Policy SO3.1 (Provision of New Homes) confirms the commitment to deliver 500 dwellings to meet the unmet needs of neighbouring areas in the GBBCHMA. The decision taken by the Council to accommodate a proportion of the wider unmet need from the HMA is welcomed, in principle. Nonetheless, as recognised in the Plan (paragraph 6.84) the four Black Country authorities ceased work on the joint plan in 2022 and have commenced work on separate Local Plans. The Council state here that:

“The position of each authority regarding any potential shortfall in meeting their development requirements is not yet known.”

RPS disputes this assertion. RPS has reviewed progress on the various plan updates in these areas to determine the scale of the housing shortfall, and the timescales required to progress plans to adoption. This provides a basis for whether Cannock Chase is in a position to assist in addressing a proportion of the Black Country’s unmet housing need and also Birmingham’s unmet need as well.

What is the current scale of unmet housing need across wider HMA?

In this context, it is worth noting that the Black Country Authorities and Birmingham have both identified a significant housing shortfall as part of their respective plan updates that are currently ongoing. The figures below have been drawn directly from relevant consultation documents issued by the respective authorities in the last twelve months or so (sources shown in the appendix). The full summary is included at **Appendix A** of this submission. The scale of the shortfall in these areas is currently as follows:

LPA	Emerging Local Plan	Information on housing shortfall (dwellings)
Wolverhampton	Wolverhampton Local Plan	11,413
Dudley	Dudley Local Plan	1,078
Sandwell	Sandwell Local Plan	18,606
Walsall	Walsall Borough Local Plan	tbc
Birmingham	Birmingham Local Plan	78,415
Total shortfall (as at March 2024)		109,512

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Whilst the Council's Duty to Cooperate Compliance Statement (December 2023), issued alongside the Reg 19 Plan consultation, refers to the current published position on unmet need across the West Midlands, it does not refer specifically to the various local plan reviews coming forward at this time.

The analysis summarised above illustrates the significance of the current problem facing these areas. Whilst it is acknowledged the delays particularly to the Black Country authorities means these shortfalls are yet to be finalised in adopted plans, when taken together, the currently indicated unmet need for housing across the Black Country and Birmingham is currently close to 110,000 dwellings that need to be delivered somewhere in the HMA by the early 2040s. This excludes any potential unmet need from Walsall, who has yet to publish its own plan proposals. The analysis provided here shows that the scale of the shortfall has actually worsened compared to previous published sources on this matter. The public information source on this subject is provided in the *Greater Birmingham and Black Country Housing Market area (GBBCHMA) Position Statement Addendum, April 2023*. This is included in this submission at **Appendix B** which identified a shortfall of 106,654 dwellings and covers the period up to the early 2040s.

On this measure alone, the housing shortfall across the wider GBBCHMA remains a pressing and worsening issue for those authorities concerned, and remains a strategic matter that needs to be addressed as a matter of urgency.

What are the likely contributions proposed for addressing this need elsewhere in the HMA?

There is evidence to suggest that a proportion of this unmet need can be met elsewhere in the HMA.

Appendix 2 of the HMA Position Statement provides a summary of the potential contributions towards meeting the unmet need from other areas in the HMA based on figures up to April 2023. This estimates that a potential for 18,181 dwellings could be accommodated elsewhere in the HMA as an overall contribution towards the unmet need, which broadly covers the same time period to the early 2040s which defines the shortfall. The overall contribution includes the 500 dwellings proposed by the Council to be accommodated in Cannock Chase district. The total contribution would represent 16.5% of the total shortfall updated in this submission.

Paragraph 6.83 of the Reg 19 Plan refers to other authorities that had previously proposed additional housing to help meet the shortfall in the HMA, and which are referenced in the position statement. This includes Lichfield and South Staffordshire, who had previously proposed 4,500 and 2,665 dwellings respectively. However, since the position statement was published, Lichfield District Council has formally withdrawn their plan prior to examination in October 2023. Similarly, in South Staffordshire following the publication of the revised NPPF in December 2023, the Council are now aiming to re-run their Regulation 19 public consultation to include a revised strategy, expected in late spring 2024 (it is worth noting that South Staffs Members have yet to fully discuss and agree the proposals, so there is no firm date set at this time). It is now March 2024 and South Staffordshire has not published any formal consultation, at time of writing, albeit it is understood the purpose of this revised Regulation 19 consultation will be to reduce its housing provision overall.

Similarly, there are other plans where contributions are being proposed also referred to in the same statement, but where progress is delayed. Notably, in Shropshire the local plan is at an advanced stage and proposed a contribution of 1,500 dwellings towards the unmet need, but in this case the examination process has been protracted and is yet to conclude. And in Solihull, where 2,100 dwellings are proposed to meet the unmet need, the plan examination is also delayed with the strong likelihood of further hearings being required and which are expected later in 2024.

On this basis, it remains a matter of speculation whether these four authorities will actually deliver any of the promised contributions. If these do not progress as planned, this would leave a potential contribution of only 7,900 dwellings towards the unmet need (or 7.2% of the total shortfall). It is also apparent, given

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the delays in the various plan reviews currently in progress, that the scale of the shortfall will not be addressed any time soon within the wider HMA. This would leave 102,100 dwellings shortfall to be addressed elsewhere across the wider HMA authorities who are able to make a contribution based on our analysis.

What is the timeframe for when the quantum of unmet need will be formally established in the source authority plans?

Based on the analysis of unmet need set out above, RPS contends that the general scale of the housing shortfall (if not precise and settled figures) emanating from the West Midlands conurbation over the next few years is known and that neighbouring authorities should include appropriate policy mechanisms that enable the shortfall to be addressed.

Even were it accepted that the scale of the problem has yet to be formally confirmed in a final version of the updated plans for those areas, RPS has determined that the various plan review processes in the Black Country (with the exception at the time of writing of Walsall MBC) and Birmingham are likely to reach pre-submission (or final) stage by the end of this years (2024). A summary of the key consultation dates (Pre-submission / adoption) for the Black County and Birmingham local plans is set out in **Appendix A** of this submission. This shows that formal adoption of those reviews is expected by the end of 2025 / or 2026. It is logical to conclude that these plans are likely to update the development plan framework across the conurbation, and which will effectively 'fix' the unmet need issue within the next two years. On this basis, the preferred approach should be for the Council to plan for an early review of the adopted Plan once the extent of the unmet need is known.

A case for a local plan trigger in Cannock

RPS accepts that the local plan review in Cannock Chase has now reached the latter stages (albeit not yet submitted to examination). RPS also accept that to delay the current plan review process to deal with this matter now would prevent the Council from adopting an up to date plan in accordance with national policy. Nevertheless, the circumstances regarding the scale of the housing shortfall in the wider HMA are clear, as outlined above.

On this basis, even if the various timetables for adoption of the 'source' authorities were to slip (which is possible) it is equally conceivable that the quantum of unmet need for those plans up to at least 2040 will be confirmed at an earlier point than the five-year review trigger for newly adopted plans set out in national policy (NPPF, paragraph 33).

RPS contend therefore, that the Council has not gone far enough in addressing the duty to cooperate and the need for effective engagement on cross-boundary matters, as required under national policy (NPPF, para 24-27) within the Reg 19 Plan, given the evidence on unmet need currently available.

The current contribution is 500 dwellings, or just 0.5% of the outstanding shortfall of 102,100 dwellings in the Reg 19 Plan is welcome, but it is also clear that a substantial shortfall currently exists well beyond the 500 figure. Given the Cannock Local Plan Review is proceeding in advance of the HMA conurbation plans, where future adopted plans will more precisely quantify that shortfall, it would be inappropriate at present to seek to 'impose' an additional DtC housing requirement beyond the 500 dwelling figure already committed to in the Cannock Local Plan.

However, this doesn't mean the whole issue should be ignored if required to be addressed through a statutory five-year review process. In this context the plan is unsound. What is required is a policy approach that provides the mechanism to deal with the problem as soon as is practical to do so.

Suggested wording

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In order to remedy this soundness issue satisfactorily, RPS argue it is proportionate and reasonable for the Council to include a suitably worded 'trigger mechanism' in the Reg 19 Plan. Such a trigger policy would allow for an orderly early review of the adopted plan to commence once the neighbouring source authority's plans have been adopted. On this basis, Cannock Chase would then commence a review (or partial review) and update its current contribution in light of the available evidence on the unmet need stemming from the wider HMA issue at that time.

RPS proposes a draft policy (set out in Q5 below) which should be submitted as a 'main modification' for consideration at the forthcoming examination once the Reg 19 Plan is formally submitted to the Planning Inspectorate.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Insert a new policy into the Cannock Chase Local Plan, as follows:

"In line with the Duty to Co-Operate (or any future alignment test or equivalent process consistent with the need for effective engagement on cross-boundary matters as set out in national policy) due consideration will be given, including through a review of the Local Plan, to the housing needs of neighbouring local planning authorities within the same housing market area.

The trigger for a review of the Cannock Chase Local Plan will be within six months of the formal adoption of the local plans in the Black Country authorities and Birmingham where the extent of any unmet housing need and its redistribution within the housing market area has been established if this is within the next five years, or five years after adoption of the Cannock Chase Local Plan.

Following the review, the Council will commence the update of the adopted Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) or any subsequent legislation, within twelve months of the adoption of the relevant neighbouring authorities plan. Once the update has commenced the Council will submit the updated Plan to the Planning Inspectorate for Examination and ensure adoption of the updated Plan is achieved within a thirty-month timeframe from commencement of the update."

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-

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Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To properly represent our client and be able to respond verbally to issues raised at the hearings.

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: [REDACTED]

Date: 18/3/24

LPA	Current Strategic Policies	Emerging Local Plan	Emerging LP plan period	Latest consultation stage	Key Consultation dates - Reg 19	Expected Adoption Date	Expected of shortfall known?	Information on housing shortfall	GB Review?	Source
Wolverhampton	BC Core Strategy 2006-26	Wolverhampton Local Plan	2020-2042	Issues and Preferred Options consultation expected 26 Feb -10 April 2024	Winter 2024 (December)	2026	Yes	Identified shortfall of around 11,413 dwellings - WCC will seek contributions from neighbouring areas in the WGBBCHMA	No	Cabinet Report dated 21 February 2024 Wolverhampton Local Plan Issues and Preferred Options Consultation, para 3.7; LDS
Dudley	BC Core Strategy 2006-26	Dudley Local Plan	2023-2041	Draft Dudley Local Plan - Reg 18 held during Oct-Nov 2023	Autumn 2024	2026	yes	Identified shortfall of 1,078 dwellings - will seek contributions from neighbouring areas across the GBBCHMA	No	Draft LP (Part 1) Policy DLP1, Table 5.1; LDS
Sandwell	BC Core Strategy 2006-26	Sandwell Local Plan	2025-2041	Issues and Options consultation held during Feb-March 2023	Summer 2024	2025/2026	yes	Identified shortfall of 18,606 dwellings - further evidence gathering and engagement in progress	No	Draft Sandwell Local Plan Regulation 18 consultation Urban Capacity Appraisal November 2023, para 104; LDS
Walsall	BC Core Strategy 2006-26	Walsall Borough Local Plan	unknown	Formal consultation has not yet commenced	unknown	unknown	yes	To be determined through the plan-making process.	tbc	Walsall Local Plan website;
Birmingham	Birmingham Development Plan 2011-31	Birmingham Local Plan	2020-2042	Issues and Options consultation held during Oct-Dec 2022	Spring 2025 (February)	2026		Identified shortfall of 78,415 dwellings - BCC will continue to be reliant on working with other local authorities within the Housing Market Area to deliver our required housing growth (IO, para 4.1)	tbc	Our Future Birmingham City Plan Birmingham Local Plan Issues and Options October 2022; GREATER BIRMINGHAM AND BLACK COUNTRY HOUSING MARKET AREA (GBBCHMA) POSITION STATEMENT ADDENDUM, April 2023, Appendix 2; LDS

GREATER BIRMINGHAM AND BLACK COUNTRY HOUSING MARKET AREA (GBBCHMA) POSITION STATEMENT ADDENDUM, April 2023

1. In December 2021 an addendum¹ was published to update the third Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement (published September 2020)² This second addendum updates key information to the year end 2020/21. The overall timeframe covered remains 2011-31. The reporting format follows that set out in the Strategic Growth Locations Study (GL Hearn / Wood, 2018).³
2. All data has been provided and verified by the fourteen GBBCHMA local planning authorities. The 2020/21 data is directly comparable with the 2018/19 data published in the 2020 Position Statement and the 2019/20 data in the 2021 addendum as it incorporates the local non-implementation discounts (September 2020 document, Table 4). The 2020/21 summary data (and that for previous years) by supply category is shown in table 1 below.

GBBCHMA summary of land supply by category

Table 1: GBBCHMA land supply summary (31st March 2021)

	SGS baseline	2017 published	2017 update (revised)*	2019	2020	2021
	2011-2031					
Total Supply:	191,654	197,273	199,238	205,382	201,677	205,926
of which						
Completions	35,016	40,092	40,092	63,383	75,607	84,809
Sites with planning permission	55,759	61,211	61,508	61,058	54,615	61,546
Allocations in adopted plans	49,485	41,740	42,230	36,007	27,802	21,372
Proposed Allocations in emerging plans	19,443	19,101	19,101	11,413	11,274	12,861
Additional urban supply	17,114	18,811	19,989	19,410	19,784	13,717
Windfalls	14,837	16,318	16,318	14,111	12,595	11,621

* Dudley MBC data revised only

3. The 2020/21 data shows that the capacity to accommodate new homes has increased to 205,926 compared to 201,677 in the previous year, a difference of 4,252. As Table 2 shows, Birmingham is responsible for identifying by far the largest share of additional capacity, sufficient to accommodate an additional 18,703 homes. Most of the lost capacity can be accounted for by Sandwell, where a review of land allocations has reduced the amount of occupied employment land likely to be available for housing. A full schedule of capacity identified by local authorities in 2021 is included as Appendix 1.

¹ [GBBCHMA housing supply and need position statement September 2020 \(updated December 2021\) | Birmingham City Council](#)

² [GBBCHMA housing supply and need position statement \(September 2020\) | Birmingham City Council](#)

³ [Greater Birmingham HMA Strategic Growth Study | Birmingham City Council](#)

Table 2: GBBCHMA Change in supply by Local Authority (SGS Baseline – 2021)

	SGS Baseline	Year-end 2017	Year-end 2019	Year-end 2020	Year-end 2021	Change SGS baseline to 2021	% change
Birmingham	51,458	56,598	65,400	67,529	70,161	18,703	36%
Bromsgrove	5,099	5,099	5,335	5,441	5,616	517	10%
Cannock Chase	4,615	4,920	4,969	5,597	5,843	1,228	27%
Dudley	17,918	18,911	17,514	16,420	16,411	- 1,507	-8%
Lichfield	10,973	10,973	11,287	10,155	10,275	- 698	-6%
North Warwickshire	9,060	9,060	9,071	9,920	9,935	875	10%
Redditch	7,488	7,488	7,329	7,449	7,344	- 144	-2%
Sandwell	19,930	20,252	14,824	11,460	12,369	- 7,561	-38%
Solihull	15,717	15,795	17,273	16,959	16,135	418	3%
South Staffordshire	3,493	3,493	4,090	4,438	4,545	1,052	30%
Stratford on Avon	16,713	16,569	16,624	16,082	16,510	- 203	-1%
Tamworth	4,495	4,495	5,267	4,913	4,347	- 148	-3%
Walsall	10,879	10,879	12,155	12,595	12,321	1,442	13%
Wolverhampton	13,816	14,706	14,244	12,719	14,114	298	2%
Total	191,654	199,238	205,382	201,677	205,926	14,272	7%

Calculating the shortfall

- Table 3 shows the estimated shortfall as at 2020/21 indicating that it is now 2,053, compared to 6,302 the previous year. As reported in the previous addendum and position statements, Stratford-on-Avon and North Warwickshire straddle the GBBCHMA and the Coventry and Warwickshire Housing Market Area (C&WHMA). Consequently, their entire supply of housing land cannot be assumed to meet GBBCHMA needs. Like Birmingham, Coventry was unable to meet its Objectively Assessed Need (OAN) within its administrative boundary and has signed a Memorandum of Understanding (MoU) with the Warwickshire Districts to distribute this. The agreed MoU states that 2,880 dwellings in Stratford-on-Avon and North Warwickshire’s local plans are to meet unmet needs within the CWHMA. Therefore, this contribution must be deducted from the GBBCHMA housing land supply (2011-31).

Table 3: GBBCHMA Change in Shortfall SGS Baseline - 2021

	SGS baseline	2017 published	2017 update (revised)	2019	2020	2021
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099	205,099	205,099
Contribution to CWHMA	-2,880	-2,880	-2,880	-2,880	-2,880	-2,880
Minimum Housing Requirement	207,979	207,979	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,273	199,238	205,382	201,677	205,926
Total shortfall / surplus	16,325	10,706	8,741	-2,597	-6,302	-2,053

Local Plan reviews

5. Appendix 2 sets out the position regarding local plan reviews in March 2023. The wider GBBCHMA contributions from North Warwickshire (3,790 homes) and Solihull (2,105 homes) local plan reviews are captured in the data in tables 1 – 3, as these Plans are adopted and at examination respectively. Table 4 sets out those local plans within the GBBCHMA that are at Regulation 19 stage and anticipate making contributions to the wider GBBCHMA shortfall. These potential contributions are not yet included in tables 1-3. Although not in the GBBCHMA, the Shropshire Local Plan review has identified additional housing capacity which would contribute towards the Black Country shortfall which forms part of the wider GBBCHMA shortfall, given its strong functional relationship with the Black Country.

Table 4: Potential further contributions - March 2023

Local Plan	Timeframe	GBBCHMA contribution
Lichfield Regulation 19, July 2021	2018-40	2,665 (2,000 to Black Country post 2027)
Cannock Chase - Regulation 19, September 2022	2018-38	500
South Staffordshire - Regulation 19, November 2022 ⁴	2018-38	4,000
Shropshire Examination commenced, July 2021	2016-38	1,500 towards Black Country shortfall

Looking ahead

6. This document focuses on the period 2011-2031, uses figures from the municipal year 2020/21 and deals primarily with the 37,900 home shortfall identified in the Birmingham Development Plan 2011 - 31 (BDP, adopted 2017⁵). As plans are now in the process of being reviewed their end dates will extend and housing need must be calculated using the Standard Method as required by the current National Planning Policy Framework and Guidance.
7. As of January 2022, the BDP became five years old and upon reaching this milestone its housing requirement became out of date and instead the Standard Method should be used until such time as a new requirement is set in a reviewed local plan. In late 2022 Birmingham City Council formally commenced the review of its plan and estimated a shortfall of 78,415 homes to 2042 in its Issues and Options document based on the Standard Method. The Standard Method calculation of Housing Need is higher than that used in the Strategic Growth Study baseline, which along with extended plan periods implies a much higher shortfall going forward. Further details and links can be found in Appendix 2.
8. In summer 2021, the Black Country Authorities consulted on a Regulation 18 Draft Black Country Plan which estimated a shortfall of 28,239 homes to 2039 based on the Standard Method. This is not reflected in the above information, which only extends to April 2021. Although progress on the Black Country Plan ceased in October 2022 in favour of separate

⁴. Progress has been paused pending the outcome of the Government's proposed changes to national planning policy

⁵ [Adopted Birmingham Development Plan](#) | [Birmingham Development Plan](#) | [Birmingham City Council](#)

local plans for Dudley, Sandwell, Walsall, and Wolverhampton, this is the latest published estimate.

APPENDIX ONE															
GBBCHMA: Land supply by category as at 31 March 2021															
	Birmingham 2021	Bromsgrove 2021	Cannock Chase 2021	Dudley 2021	Lichfield 2021	North Warwickshire 2021	Redditch 2021	Sandwell 2021	Solihull 2021	South Staffordshire 2021	Stratford on Avon 2021	Tamworth 2021	Walsall 2021	Wolverhampton 2021	Total 2021
Sites with planning permission	27,474	1,049	1,203	3,148	4313	1254	590	3,044	2,155	1773	6,697	1,656	2,252	4,938	61,546
Allocations - Adopted Plans	5,791	1,366	58	2,969	870	5982	4,318	1495	315	268	850	387	1465	1,220	27,354
Proposed Allocations - (current SADs / new Local Plans)	0	0	0	0	719	0	0	0	6,018	0	142	0	0	0	6,879
Additional Urban Supply	7,111	102	1,329	1,832	0	0	97	298	353	0	0	0	1,845	750	13,717
Windfall	3,610	320	48	1,810	440	660	66	640	1,600	210	370	266	679	902	11,621
Completions 2011/12 - 20/21 (10 years)	26,175	2,779	3,205	6,652	3933	2039	2,273	6,892	5,694	2,294	8,451	2038	6,080	6,304	84,809
Total	70,161	5,616	5,843	16,411	10275	9935	7,344	12,369	16,135	4,545	16,510	4,347	12,321	14,114	205,926
Estimated land supply 21/22 - 30/31 (10 years)	43,986	2,837	2,638	9,759	6342	7896	5,071	5,477	10,440	2,251	8,059	2,309	6,241	7,810	121,116

APPENDIX TWO

SUMMARY OF GBBCHMA shortfall and potential contributions (April 2023)

Local Authority	Plan timeframe (for housing purposes ⁶)	Published housing shortfall	Latest published document and link	Next key stages
Birmingham (Plan review)	2020 -2042	78,415	A revised Local Development Scheme (LDS) was published in October 2022 Local Development Scheme for Birmingham Birmingham City Council and the issues and Options consultation took place October – December 2022 Issues and Options Consultation New Local Plan for Birmingham Birmingham City Council . This states a need of 149,286 homes with an estimated 78,415 shortfall.	Preferred Option (Regulation 18), October-November 2023 Publication / Pre-submission (Regulation 19), October 2024 Submission for examination (Regulation 22), June 2025
Black Country	2018 - 39	28,239	Regulation 18 Draft Black Country Plan published for consultation in August 2021. The overall housing need was 76,076 of which 47,837 could be accommodated leaving a shortfall of 28,239 homes. https://blackcountryplan.dudley.gov.uk/t2/p5/ Work on the Black Country Plan stopped in October 2022 when Dudley MBC formally withdrew from the process. The four local authorities are now preparing separate local plans (see below).	Not to be progressed
Dudley (First post NPPF local plan)	2024-2041		Local Development Scheme approved January 2023 Local Development Scheme Dudley Council	Regulation 18 Preferred Option, Summer 2023 (timescale to be reviewed in light of Government’s review of national planning policy) Regulation 19 Publication Version, Spring / Summer 2024 Submission for examination, Autumn 2024

⁶ NPPG (para 008) requires local housing need to be updated up until Submission. Local housing need calculated using the standard method cannot be applied retrospectively. Therefore, the start date for housing purposes for any Local Plan will always be the monitoring year before Submission.

Sandwell (First post NPPF local plan)	2024-2041		Local Development Scheme published November 2022 Sandwell Local Development Scheme (LDS) Sandwell Council . Issues and Options published for consultation February – March 2023, this states that 30,300 homes are required and suggests a likely shortfall in provision but does not yet provide an estimate of this.	Regulation 18 Preferred Option, October 2023 Regulation 19 Submission Version, July 2024 Submission for examination, November 2024
Walsall (First post NPPF local plan)	2025-2040/42		Local Development Scheme approved November 2022 Microsoft Word - 5. Black Country Plan - Walsall Local Plan	Issues and Options consultation September/October 2023 Regulation 18 Preferred Option consultation, September – October 2024 Regulation 19 Publication Version consultation, September – October 2025 Submission for examination – March 2026
Wolverhampton (First post NPPF local plan)	2024-41		Local Development Scheme published February 2023 2 (wolverhampton.gov.uk) Timetable subject to timing of outcome of Government’s review of national policy during 2023.	Issues and Preferred Options Consultation (Regulation 18), July – September 2023 Publication (Regulation 19), Feb - April 2024 Submission for examination, Mid 2024 Adoption, Late 2025
Total shortfall		106,654		
		Housing contribution		
South Staffordshire (First post NPPF local plan)	2018-38	4,000	A revised Local Development Scheme published in November 2022 Local Development Scheme October 2022 (sstaffs.gov.uk) A Publication version local plan (Regulation 19) was consulted in November – December 2022. This includes a housing requirement of 8,881 of which 4,000 is to meet the GBBCHMA shortfall.	Submission of Local Plan, Spring 2023. • Local Plan Examination, Summer 2023 • Adoption of Local Plan, Winter 2023 The Council has since advised that progress on the local plan review has been suspended pending the outcome of Government’s review of national policy.
Lichfield (Plan review)	2018-40	2,655	The Lichfield Plan was submitted for examination in June 2022, hearings have yet to commence.	

		(2,000 for Black Country post 2027)	<p>Local plan examination – Hearing sessions - agendas, statements & action points (lichfielddc.gov.uk)</p> <p>Policy SP1 of the plan document proposes 7,062 dwellings to meet local need and 2,655 dwellings to meet wider HMA needs. Paragraph 4.22 states that 2,000 of this is specifically to meet the Black Country shortfall.</p>	
Cannock Chase (Plan review)	2018-39	500	<p>A revised Local development Scheme was published in July 2022 lds_july_2022.pdf (cannockchasedc.gov.uk)</p> <p>Full Council approved the Regulation 19 Local Plan for consultation in Full Papers - Council 070922 (cannockchasedc.gov.uk) September 2022, consultation has yet to commence.</p> <p>Provision for 6016 dwellings, 500 of which contribute to the GBBCHMA shortfall</p>	LDS states submission for examination: Spring 2023 but may be some slippage.
Solihull (Plan review)	2020-36	2,105	<p>Local Development Scheme revised January 2020 Solihull LDS</p> <p>Local Plan review examination hearings commenced September 2021 and are currently paused. Solihull Local Plan Review</p>	Examination in public paused to consider implications of changes to national policy.
North Warwickshire (Adopted second post NPPF local plan)	2014-2033	3,790 + 620	<p>Local Plan adopted September 2021 North Warks Local Plan</p> <p>Makes a contribution based on a 10% of the Birmingham shortfall (3,790 which includes 500 to meet unmet Tamworth need), plus an additional 940 above own demographic need for workforce / economic uplift apportioned 65% GBBCHMA / 35% C&WHMA (620/320). Principles of latter tested through Warwick District Council and Coventry City Council examination hearings.</p>	As the Local Plan has recently been adopted, no formal timetable has been set for review.

			A Local development Scheme was published in April 2022 Local Development Scheme downloads North Warwickshire (northwarks.gov.uk)	
Bromsgrove (Plan review)	2023-40 (provisional)		<p>Latest Local Development Scheme published 2021 but currently under review Bromsgrove LDS</p> <p>Announcement in August 2022 that local plan preparation is delayed to gather further evidence regarding infrastructure. Bromsgrove District Plan Review - bromsgrove.gov.uk</p>	Under review
Stratford on Avon (Plan review)	2011-2031 2025-2050	2,720 + 530	<p>A revised Local Development Scheme was published in April 2022</p> <p>A Site Allocations Plan Revised Preferred Option has been published in June 2022 for consultation following adoption of the Core Strategy in 2016 REVISED PREFERRED OPTIONS SAP JUNE 2022 .pdf (stratford.gov.uk) This identifies capacity for a further 1,517 homes for reserve purposes, including contributing towards housing arising from outside Coventry & Warwickshire (as set out in Annex 1). Annex 1 is referred to in paragraph 2.4.7 associated with Policy SAP.4, and SAP.4 itself lists the sites to meet the GBBCHMA area which would provide approximately 530 dwellings in total.</p> <p>The Core Strategy is being reviewed via the South Warwickshire Local Plan in conjunction with Warwick District Council an issues and Options document was consulted on January – March 2023 South Warwickshire Local Plan</p>	<p>Site Allocations Plan Regulation 19 Publication version, November/ December 2023 Adoption, Summer 2025</p> <p>South Warwickshire Local Plan Regulation 18 Preferred Option, July – October 2023 Regulation 19 Publication version, June – August 2024</p>
Tamworth (Plan review)	Up to 2043	N/A	<p>Revised Local Development Scheme published September 2022 Title (tamworth.gov.uk).</p> <p>Issues and Options consultation took place in Autumn 2022</p>	Preferred Option, early 2024 Pre-Submission Regulation 19, early 2025 Submission for examination, late 2025

			Appendix A Draft Issues and Options Consultation Document.pdf (tamworth.gov.uk)	
Redditch (Plan review)	2011-30	N/A	Redditch has shortfall of 3,600 dwellings, which is been met through the adopted Bromsgrove local plan. A Local development Scheme was published in November 2021 and is currently under review Vision (redditchbc.gov.uk)	Under review
Authorities beyond GBBCHMA				
Shropshire (First post NPPF local plan)	2016-38	1,500 towards Black Country shortfall	The plan is currently under examination, hearings began in July 2021. The Council is currently responding to the inspectors' requests for further information i d28-inspectors-interim-findings-letter-15-feb-2023.pdf (shropshire.gov.uk)	Examination ongoing
Telford and Wrekin (Plan review)	Up to 2040		A revised Local Development Scheme was published in June 2022. Local Development Scheme 2022 - 2025 - Telford & Wrekin Council An Issues and Options document was previously published in October 2021 Issues and Options - Review of the Telford & Wrekin Local Plan - Telford & Wrekin Council	Regulation 18 draft plan, Autumn / Winter 2023 Publication version, Summer / Autumn 2024 Submission version, Winter 2024
Wyre Forest (Recently adopted post NPPF local plan)	2016-36	N/A	The local plan was adopted in April 2022 Wyre Forest District Local Plan (2016-2036) - Adopted April 2022 - Details - Keystone (objective.co.uk)	Recently adopted local plan
Total contributions		18,181		